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**VIA ECF**

April 21, 2023

Hon. Valerie Figueredo  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-VF (S.D.N.Y.)

Dear Judge Figueredo:

I write on behalf of Dr. Vincent Wenyong Shi (“Dr. Shi”) to request an Order permitting Exhibit 1 to Dr. Shi’s April 21, 2023 letter, Dkt. 406-1, to be unsealed and filed publicly. Dr. Shi contends that Exhibit 1 is not confidential or privileged because it was disclosed to third parties and otherwise qualifies as a judicial document subject to the public right of access. *See United States v. Amodeo*, 44 F.3d 141, 146 (2d Cir. 1995). Nonetheless, because Exhibit 1 contains communications between the court-appointed receiver Robert W. Seiden (the “Receiver”) and his agent in China, Mr. Lilin “Francis” Guo, Dr. Shi filed Exhibit 1 under seal out of an abundance of caution and to provide the Receiver an opportunity to object to the unsealing of Exhibit 1. Accordingly, Dr. Shi requests that the Court enter an Order permitting Exhibit 1 to be unsealed and filed publicly on the docket of this action.

Respectfully submitted,

*/s/ Michael James Maloney*

Michael James Maloney

cc: All counsel of record (via ECF)